

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

JAMES LAFRANCE,

Defendant

) Criminal No. 20-cr-30028-MGM  
)

) Violations:  
)

) Counts One through Four: Sexual Exploitation  
) of Children

) (18 U.S.C. §§ 2251(a) and (e))  
)

) Forfeiture Allegation:  
)

) (18 U.S.C. § 2253)  
)

INDICTMENT

COUNTS ONE THROUGH FOURSexual Exploitation of Children  
(18 U.S.C. §§ 2251(a) and (e))

The Grand Jury charges:

On or about each of the dates set forth below, in the District of Massachusetts and elsewhere, the defendant,

JAMES LAFRANCE,

did knowingly employ, use, persuade, induce, and entice a person under the age of eighteen to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, such depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means including by computer, and such depiction was transported and transmitted in and affecting interstate and foreign commerce, as follows:

<b>Count</b>	<b>Date (on or about)</b>	<b>Minor Involved</b>	<b>Visual Depiction of Sexually Explicit Conduct</b>
1	December 24, 2018	Minor Victim 1	Digital file "Rec_2018 12 24 23.40.37.MP4"
2	January 8, 2019	Minor Victim 1	Digital file "Rec_2019 01 08 22.31.08.MP4"
3	July 10, 2019	Minor Victim 2	Digital file "Rec_2019 07 10 09.41.39.MP4"
4	July 10, 2019	Minor Victim 2	Digital file "Rec_2019 07 10 10.58.59.MP4"

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

CHILD EXPLOITATION FORFEITURE ALLEGATION  
(18 U.S.C. § 2253)

The Grand Jury further finds:

1. Upon conviction of one or more of the offenses in violation of Title 18, United States Code, Section 2251(a), set forth in Counts One through Four of this Indictment, the defendant,

JAMES LAFRANCE,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2253, (i) any visual depiction described in sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of Title 18; (ii) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and (iii) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property. The property to be forfeited includes, but is not limited to, the following:

- a. iMac computer bearing serial number C02KHCXRDNCR;
- b. Google pixel phone;
- c. Flash drive in leather case;
- d. Blue flash drive;
- e. Silver flash drive;
- f. Samsung cell phone; and
- g. Verizon tablet.

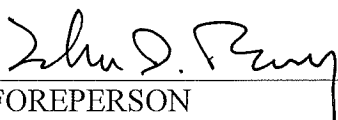
2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 2253, as a result of any act or omission of the defendant --


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States of America, pursuant to Title 18, United States Code, Section 2253(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL

  
FOREPERSON

  
ALEX J. GRANT  
ASSISTANT UNITED STATES ATTORNEY  
DISTRICT OF MASSACHUSETTS

District of Massachusetts: SEPTEMBER 17, 2020 at 12:20 p.m.  
Returned into the District Court by the Grand Jurors and filed.

  
DEPUTY CLERK